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28 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

29 In re: CATHODE RAY TUBE (CRT)
30 ANTITRUST LITIGATION

31 Master File No. 07-5944 SC (N.D. Cal.)

32 MDL No. 1917

33 This Document Relates to Individual Case
34 No. 13-CV-00157-SC

35 **AMENDED STIPULATION AND
36 [PROPOSED] ORDER REGARDING
37 BRIEFING SCHEDULE FOR THOMPSON
38 DEFENDANTS' MOTIONS TO STRIKE
39 WITH PREJUDICE TECH DATA'S FIRST
40 AMENDED COMPLAINT**

41 TECH DATA CORPORATION; TECH
42 DATA PRODUCT MANAGEMENT,
43 INC.,

44 Plaintiffs,
45 vs.
46

47 Judge: Hon. Samuel Conti

48 HITACHI, LTD; *et al.*

49 Defendants.

1 Plaintiffs Tech Data Corporation and Tech Data Product Management, Inc. (collectively,
 2 "Tech Data") and Defendants Thomson S.A. (n.k.a. Technicolor S.A.)¹ ("Thomson SA") and
 3 Thomson Consumer Electronics, Inc. (n.k.a. Technicolor USA, Inc.) ("Thomson Consumer" and
 4 together with Thomson SA, the "Thomson Defendants") hereby stipulate as follows:

5 WHEREAS, on January 16, 2014 Thomson Consumer filed its Notice of Motion and
 6 Motion to Strike With Prejudice Tech Data's First Amended Complaint [Dkt. No. 2329]
 7 ("Thomson Consumer's Motion to Strike");

8 WHEREAS, on February 3, 2014 the Court entered an Order [Dkt. No. 2368] extending
 9 the deadline: (1) for Tech Data to file its Response to Thomson Consumer's Motion to Strike
 10 until February 20, 2014 and (2) for Thomson Consumer to file its Reply in support of its Motion
 11 to Strike until March 6, 2014.

12 WHEREAS, on February 7, 2014 Thomson SA filed its Notice of Motion and Motion to
 13 Strike With Prejudice Tech Data's First Amended Complaint [Dkt. No. 2373] ("Thomson SA's
 14 Motion to Strike" and collectively with Thomson Consumer's Motion to Strike, the "Thomson
 15 Defendants' Motions to Strike");

16 WHEREAS, Tech Data's Response to Thomson SA's Motion to Strike is currently due
 17 on February 21, 2014 and Thomson SA's Reply in support of its Motion to Strike is currently
 18 due February 28, 2014;

19 WHEREAS, the parties have agreed to alter the current briefing schedule for the
 20 Thomson Defendants' Motions to Strike to provide for simultaneous deadlines as follows:

21

- 22 • The last day for Tech Data to file its Responses to the Thomson Defendants'
 23 Motions to Strike will be February 27, 2014.
- 24 • The last day for the Thomson Defendants' to file their Reply briefs in support of
 25 their Motions to Strike will be March 13, 2014.

26

27 ¹ Specially appearing Defendant Thomson S.A., a French holding company headquartered in
 28 Issy-les-Moulineaux, France, contests the Court's personal jurisdiction over it. By entering into
 this Stipulation with Tech Data Thomson S.A. does not waive its right to assert any defenses
 available to it, including lack of personal jurisdiction.

1 WHEREAS, to accommodate this modification to the briefing schedule on Thomson
2 Consumer's Motion to Strike, counsel for Tech Data and Thomson Consumer have agreed that
3 the motions hearing on Thomson Consumer's Motion to Strike should be reset for March 21,
4 2014;

5 NOW, THEREFORE, IT IS HERBY STIPULATED AND AGREED between counsel
6 for Tech Data and the Thomson Defendants as follows:

7 1. The last day for Tech Data to file its Responses to the Thomson Defendants'
8 Motions to Strike shall be February 27, 2014.

9 2. The last day for the Thomson Defendants to file their Reply briefs in support of
10 their Motions to Strike shall be March 13, 2014.

11 3. The motions hearing on Thomson Consumer's Motion to Strike shall be set for
12 March 21, 2014.

13 **IT IS SO STIPULATED.**

14 Dated: February 13, 2014.

15
16 By:

Respectfully Submitted,

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18 /s/Scott N. Wagner
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/s/ Philip J. Iovieno

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1 **FILER'S ATTESTATION**
2

3 I, Scott N. Wagner, am the ECF user whose identification and password are being used
4 to file this Stipulation. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that concurrence
5 in the filing of this document has been obtained from the signatories above.

6 /s/ Scott N. Wagner
7 Scott N. Wagner
8

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 Dated: February 19, 2014

